



EEB2
CONTROLLER'S RECORD OF PERSONAL DATA
PROCESSING ACTIVITY

Item No.	33	
1.	Name, department and e-mail address of Delegated Controller (author)	Charlier Frank (IT-Department) frank.charlier@eursc.eu
2.	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	
I. Processing Activity		
3.	Name of processing	Management of Extranet
4.	Description and purpose of processing	<p>The EEB2 IT department has written an application for teachers and management to perform a number of functions that are not available in the School Management System of the European Schools (SMS).</p> <p>Teachers have the possibility to:</p> <ul style="list-style-type: none"> • Print out lists and data about their students (name, class, date of birth, nationality, gender, courses); • Search all students and see their photo, schedule, and nationality; • Search all teachers and see their photo, schedule, email address and nationality. <p>Senior management (Director and 2 Deputy Directors) and Educational Advisors have the possibility to:</p> <ul style="list-style-type: none"> • Do everything that teachers can do; • View detentions (disciplinary) and Class Councils (evaluations of academic performance in secondary school). <p>Educational Advisors also have the possibility to:</p> <ul style="list-style-type: none"> • block student cards; • manage the class counsel screen • manage the lockers. <p>The data for this application comes from SMS and is kept, together with the photos of the teachers and students, in a database managed locally by the EEB2 IT department.</p> <p>Log files are maintained which allow the system administrator to see who has logged in.</p> <p>The extranet menus and submenus involving personal data are attached.</p>
5.	Name and e-mail address of	VanderEycken (School Photographer)

	processor (sub-contractor)	Contracts with EEB2 is attached
6.	Does the processing operation involve any automated decision-making/profiling?	<input type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual (not automated)
7.	Storage media	<input type="checkbox"/> Paper <input checked="" type="checkbox"/> Electronic
8.	Retention period	<i>Please suggest what you believe would be a reasonable retention period based on need and any applicable EU or Belgian legal obligations of which you are aware:</i> <input type="checkbox"/> ___ days <input type="checkbox"/> ___ weeks <input type="checkbox"/> ___ months <input type="checkbox"/> ___ years <input checked="" type="checkbox"/> other (Accounts are active while the teachers, senior management or Educational Advisor is employed at EEB2; data held in the extranet database at EEB2 of teachers and students will be kept for the current school year + school year -1)
II. Legal basis		
9.	Legal basis of processing	<input type="checkbox"/> Data subject's consent (attach blank consent form) <input type="checkbox"/> Necessary for compliance with legal obligation <input type="checkbox"/> Necessary to protect data subject's vital interests <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority <input type="checkbox"/> Necessary for legitimate interests of controller or 3 rd party <input type="checkbox"/> Necessary for performance of contract
III. Data		
10.	Categories of data subjects	<input checked="" type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old <input type="checkbox"/> Parents <input type="checkbox"/> PAS <input type="checkbox"/> Seconded staff (excluding teachers) <input checked="" type="checkbox"/> Seconded staff (teachers) <input checked="" type="checkbox"/> Locally recruited staff (teachers) <input type="checkbox"/> Interim staff <input type="checkbox"/> (Successful) candidates (to a vacancy) <input type="checkbox"/> Unsuccessful candidates (to a vacancy) <input type="checkbox"/> Trainees <input type="checkbox"/> Vendors <input type="checkbox"/> Other (specify)
11.	Categories of personal data collected	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Surname <input checked="" type="checkbox"/> Date of birth <input type="checkbox"/> City of birth <input type="checkbox"/> Country of birth <input checked="" type="checkbox"/> Nationality <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Data concerning siblings <input checked="" type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input type="checkbox"/> Professional email address <input type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input type="checkbox"/> Home address <input checked="" type="checkbox"/> Picture <input checked="" type="checkbox"/> Student ID number <input type="checkbox"/> Parental marital status <input type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information

12.	Documents collected containing personal data	<input type="checkbox"/> Copy of passport <input type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate <input type="checkbox"/> Document proving the exercise of parental authority <input type="checkbox"/> CV <input type="checkbox"/> Motivation letter <input type="checkbox"/> Application email of the candidate <input type="checkbox"/> Correspondence with the candidate <input type="checkbox"/> Declaration concerning the relevant professional experience <input type="checkbox"/> Declaration concerning allowances <input type="checkbox"/> Copy of relevant diploma <input type="checkbox"/> Reference letter <input type="checkbox"/> Work contract <input type="checkbox"/> Evaluation sheets
13.	Special categories of data	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input type="checkbox"/> health data <input type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input checked="" type="checkbox"/> data revealing racial or ethnic origin <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input type="checkbox"/> data revealing political opinions <input type="checkbox"/> genetic data <input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> data concerning criminal convictions and offences <p>2. Justification for processing:</p> <input type="checkbox"/> data subject's explicit consent <input type="checkbox"/> relates to personal data made public by the data subject <input type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law <input type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims <input checked="" type="checkbox"/> Processing necessary for reasons of substantial public interest <input type="checkbox"/> Processing necessary for medical/health care <input type="checkbox"/> Processing necessary for public health <input type="checkbox"/> Processing necessary for archiving, research or statistics
IV. Rights of Data Subjects		
14.	Privacy statement (Information provided to the data subject)	<input checked="" type="checkbox"/> Data collected from data subject <input type="checkbox"/> Data not obtained from data subject
15.	Manner of providing the privacy statement to the data subjects (procedure to grant rights)	<p><i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</i></p> <input checked="" type="checkbox"/> online <input type="checkbox"/> email <input type="checkbox"/> text (by phone number) Specify:
V. Access and disclosure		

16.	Recipients of the data	<i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.</i>
17.	Transfers to non-EU countries or international organisations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made _____ Basis of transfer: <input type="checkbox"/> Adequacy decision relating to recipient country (Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework) <input type="checkbox"/> Appropriate safeguards established <input type="checkbox"/> Derogation: <input type="checkbox"/> Data subject's explicit consent <input type="checkbox"/> Transfer necessary for performance of contract with data subject <input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf <input type="checkbox"/> Transfer necessary for important reasons of public interest <input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent <input type="checkbox"/> Transfer of data from a public register
18.	Is a Data Protection Impact Assessment required?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type: <input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature <input checked="" type="checkbox"/> Data concerning vulnerable data subjects <input type="checkbox"/> Data processed on a large scale <input type="checkbox"/> Systematic monitoring <input type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions <input type="checkbox"/> Automated decision making with legal or similar significant effects <input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract